

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE -- RENEWAL

PERMITTEE

Technical Laminations and Coatings, Inc.
Attn: Rebecca Parr
420 Northgate Parkway
Wheeling, Illinois 60090

<u>Application No.:</u> 85060023	<u>I.D. No.:</u> 031324ACZ
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 17, 2005
<u>Subject:</u> Adhesive Tape Manufacturing Plant	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 420 Northgate Parkway, Wheeling	

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one adhesive coating line controlled by thermal afterburner pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic materials (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for combined HAPs). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The adhesive coating line is subject to a New Source Performance Standard (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subparts A and RR. The Illinois EPA is administrating NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The coating line shall comply with the following emission standards pursuant to 40 CFR 60.442:
 - i. Do not cause the discharge into the atmosphere more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or
 - ii. Demonstrate for each coating line:
 - A. A 90 percent overall VOC emission reduction as calculated over a calendar month; or

- B. The percent overall VOC emission reduction specified in §60.443(b) as calculated over a calendar month.
- c. At all times, the Permittee shall, to the extent practicable, maintain and operate coating line in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.
3. The paper coating operations performed at the facility are subject to the VOM emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations. Compliance with the requirements of this subpart shall be achieved through the use of compliance coating pursuant to Section 218.204(c): the VOM content of the coatings, as applied, shall not exceed 2.3 lb/gal (excluding water and any compounds which are specifically exempted from the definition of VOM), or through the use of a capture system and control device that provides 81 percent reduction in the overall VOM emissions and a control device has 90 percent efficiency, pursuant to 35 Ill. Adm. Code 218.207(b) (1).
4. The VOM emissions from the two coater/laminators shall not exceed 2.0 tons/mo and 17.8 tons/yr.

The VOM emissions shall be determined from the following equation:

$$E = \sum [(U_C \times C_{UC}) \times (1 - CE) + U_{NC} \times C_{UNC}], \text{ Where:}$$

E - VOM emissions (ton);

U_C - raw material usage with afterburner running (ton);

C_{UC} - VOM content of the raw material used with afterburner running (wt. fraction);

CE - overall efficiency of the capture and control device (fraction) demonstrated during the most recent stack test;

U_{NC} - raw material usage with uncontrolled emission (ton);

C_{UNC} - VOM content of the raw material used with uncontrolled emission (wt. fraction).

For the purpose of compliance with 40 CFR 60.442 emission standard the monthly VOM emissions shall not exceed 10% of corresponding month VOM usage determined as $U_C \times C_{UC} + U_{NC} \times C_{UNC}$ on the coating line.

These limits are based on the maximum production rate. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months.

5. The VOM usage and emissions from equipment clean-up operations shall not exceed 0.2 ton/mo and 2.0 ton/yr. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months.
6. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as

a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

- 7a. The control system shall be in operation at all times when VOM content of applied coatings exceeds requirements of 35 Ill. Adm. Code 218.204(c).
- b. The control device shall be equipped with a monitoring device which is installed, calibrated, and maintained to continuously indicate and record the afterburner combustion chamber temperature.
- 8a. The Permittee shall maintain daily records of the following items:
 - i. The names, identification numbers and usage of each coating as applied on the coating line, separately for periods of times when control device was running and when emission to atmosphere was uncontrolled;
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on the coating line, separately for periods of times when control device was running and when emission to atmosphere was uncontrolled;
 - iii. The records of the afterburner continuous monitoring device;
 - iv. The records of all 3-hour periods (during actual coating operations) during which the average temperature of the afterburner combustion chamber is more than 28°C (50°F) below the average temperature of the device during the most recent performance test.
- b. The Permittee shall maintain monthly records of the following items:
 - i. The names, identification numbers and usage of each coating (gal/mo, gal/yr or ton/mo, ton/yr), separately for periods of times when control device was running and when emission to atmosphere was uncontrolled;
 - ii. The weight of VOM per volume of each coating (lb/gal or wt.%) as applied, separately for periods of times when control device was running and when emission to atmosphere was uncontrolled;
 - iii. HAPs content of each coating (lb/gal or wt.%);
 - iv. Clean-up solvent usage (ton/mo and ton/year) and its VOM and HAP content (wt. %);
 - v. Compliance calculations required by 40 CFR 60.443(b);
 - vi. VOM and HAP emission calculations (ton/mo and ton/year);
- 9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from

the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an
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electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P. E.
Manager, Permit Section
Division of Air Pollution Control

DES:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the adhesive tape manufacturing plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, 25 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, coatings used and control measures are more effective than in this permit.

<u>Emission Units</u>	Emissions (tons/year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAP</u>
Coating Line	19.8	<10	<25

VJB: